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July 31, 2019

VIA CERTIFIED MAIL

N.C. Tom Fergusnon
Mayor of Hernando
475 West Commerce Street
Hernando, MS 38632

Scott Worsham
Chief of Police - Hernando
475 West Commerce Street
Hernando, MS 38632

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Darren Musselwhite
Mayor of Southaven
8710 Northwest Drive
Southaven, MS 38671

Macon Moore
Chief of Police- Southaven
8691 Northwest Drive
Southaven, MS 38671

Broderick Hutchins
Captain -- Mississippi Highway Patrol
22000-A Highway 35 North
Batesville, MS 38930

Lynn Brown
Officer - Hernando Police Department
475 West Commerce Street
Hernando, MS 38632

Scott Phillips
Mayor of Olive Branch
9200 Pigeon Roost
Olive Branch, MS 38654

Don Gammage
Chief of Police -- Olive Branch
9200 Pigeon Roost
Olive Branch, MS 38654

Re: Police Chase of Alleged Stolen Vehicle
Incident Date: On or about Saturday, July 27, 2019
Location: Interstate 55 near Commerce Street in Hernando, MS
Our Clients: Kristopher Ford, Deceased & Jesse White, Deceased

EXHIBIT
A

Dear Gentlemen:

Please be advised this firm is contacting the Hernando Police Department, Horn Lake Police Department, Desoto County Sheriff's Department, Southaven Police Department and Mississippi Highway Patrol on behalf of our clients, the parents of Kristopher Ford, Deceased and the parents of Jesse White, Deceased, in an effort to preserve evidence for any and all claims that our client's families may have against each law enforcement agency participating in the above referenced incident that took place on or about Saturday, July 27, 2019.

The family of each deceased requests that you continue your commitment towards transparency and work closely with the family to help them understand how it is Kristopher Ford and Jesse White lost their lives. Further, the family additionally requests that you share any information with the family before it is otherwise released to the press or the public so the family does not have to gather further information from news sources.

By this letter, you are hereby given notice not to destroy, conceal or alter any video or other recorded materials and/or any documents or other materials generated from the above referenced incident. Specifically, please preserve all such materials, including, but not limited to the entire investigative file, any and all surveillance video footage from the police chase; any and all recorded communications between law enforcement from July 27, 2019 beginning at 2:00 a.m. and ending at 6:00a.m.; the clothing Kristopher Ford and Jesse White were wearing; crime scene photographs; photographs of each occupant of the Nissan Maxima in the subject crash; photographs of all officers involved in the foregoing incident; calls for service; investigation, reports/documents; memoranda of any kind; material, including video footage, taken from a cell phone; fire department records; EMS records; witness reports, employee records; body cameras on the officers; patrol cars with video cameras; computer notes in cars, Internal Affairs files, (including but not limited to notes, memos, witness statements, photographs; police reports); booking information; witness statements; any and all documents related to the above referenced matter not specifically identified herein. If your department or city was not involved in the incident but received any radio or other electronic transmissions related in any way thereto, you are hereby instructed to preserve them. Please take all steps necessary to prevent the deletion and/or alteration, whether intentional or not, of this material.

We request that all audio and video recordings of Officer Lynn Brown of the Hernando Police Department be preserved for his entire shift that started and/or ended on July 27, 2019, more specifically prior and after this incident. In addition, Lynn Brown is to preserve any and all social media accounts, posts and pictures to include, but not limited to, Facebook, Instagram and Twitter. Lynn Brown is to preserve all cellular phone data, video, text messages, evidence of live streaming and photographs taken from July 26, 2019 thru July 28, 2019

Finally, we would instruct you not to repair or otherwise alter the vehicle to which Officer Brown was assigned on any of the dates and times outlined above. The same is true for any vehicle which may have come in contact with the subject Nissan Maxima in which the decedents were occupants. We have engaged experts who need to examine the subject vehicles for accident recreation purposes *before* the vehicles are returned to service. Understanding you may need the

vehicles back in service, we are prepared to meet your experts at any time in the immediate future so there will be no dispute at a later date.

Further, we ask that we be allowed to inspect the Nissan Maxima, with our experts and in order to return any personal items to grieving families.

If your records are not preserved in accordance with your obligations and as set forth in this letter, we will seek relief for spoliation of evidence at the appropriate time, including sanctions from the court. We look forward to hearing from you in the immediate future and working with your schedules to complete the necessary tasks.

Very truly yours,

WELLS & ASSOCIATES, PLLC

A handwritten signature in black ink, appearing to be 'MB Wells', is written over the printed name of Murfay B. Wells.

Murfay B. Wells
Aaron A. Neglia